

1 WALTER R. CANNON, ESQ.
Nevada Bar No. 001505
2 KATHERINE J. GORDON, ESQ.
Nevada Bar No. 005813
3 OLSON, CANNON
GORMLEY & DESRUISSEAU
4 9950 W. Cheyenne Avenue
Las Vegas, Nevada 89129
5 (702) 384-4012 - telephone
(702) 383-0701 - facsimile
6 Attorneys for Defendant/
Counterclaimant
7 Clark County, Nevada

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 SAFETY MUTUAL CASUALTY
CORPORATION,)

12 Plaintiff,)

13 vs.)

14 CLARK COUNTY, NEVADA, and)
15 DOES I through 50, inclusive,)

16 Defendant.)

Case No 2:10-cv-00426-PMP-PAL

17 CLARK COUNTY, NEVADA,)

18 Counterclaimant,)

19 vs.)

20 SAFETY MUTUAL CASUALTY)
CORPORATION, and DOES 1)
21 through 50, inclusive,)

22 Counterdefendant.)
23

24 **STIPULATION AND ORDER TO EXTEND RESPONSE AND REPLY**
25 **DATES FOR DISPOSITIVE MOTIONS**
(2nd Request)

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1 WHEREAS, Plaintiff, SAFETY MUTUAL CASUALTY CORPORATION, filed a
 2 Motion for Summary Judgment [#39], Request for Judicial Notice [#41] and Motion to Bifurcate
 3 Trial [#42] on November 23, 2011; and

4 WHEREAS, the parties submitted a Stipulation and Order to Extend Response and Reply
 5 Dates for Dispositive Motions on November 30, 2011, which the Court granted on December 1,
 6 2011 [#44]; and

7 WHEREAS, the parties had scheduled a mediation in this matter for December 9, 2011;
 8 however, due to scheduling conflicts of the mediator and Plaintiff's client, this mediation is now
 9 rescheduled to February 6, 2012; and

10 WHEREAS, the parties are hereby requesting a second extension to respond to the
 11 dispositive motions filed by the Plaintiff;

12 IT IS HEREBY STIPULATED AND AGREED by and between the parties that, any
 13 Response to the dispositive motions filed by Plaintiff on November 23, 2011, shall be due by
 14 Defendant on January 11, 2012;

15 IT IS FURTHER STIPULATED AND AGREED by and between the parties that any
 16 Reply to the dispositive motions filed by Plaintiff on November 23, 2011, shall be due by
 17 Plaintiff on January 30, 2012.

18 DATED this 21 day of December, 2011.

DATED this 21 day of December, 2011.

20 /s/ Robert F. Balkenbush, Esq.
 21 ROBERT F. BALKENBUSH, ESQ.
 22 Nevada Bar No. 1246
 23 6590 S. McCarran Blvd. #B
 24 Reno, Nevada 89509
 25 Attorneys for Plaintiff

20 /s/ Walter R. Cannon, Esq.
 21 WALTER R. CANNON, ESQ.
 22 Nevada Bar No. 1505
 23 9950 W. Cheyenne Avenue
 24 Las Vegas, Nevada 89129
 25 Attorneys for Defendant

26 ORDER

27 IT IS SO ORDERED.

28 DATED this 21st day of December, 2011.

